

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

ALAMEDA RESEARCH LTD.,

Plaintiff,

- against -

FORIS DAX MT LTD., FORIS DAX ASIA PTE.
LTD., FORIS DAX, INC., and IRON BLOCK
CAPITAL,

Defendants.

Adv. Pro. No. 24-50188 (JTD)

Adv. Ref. Nos. 1, 3, 4, 5, 6. & 9

CERTIFICATION OF COUNSEL

I, Howard W. Robertson IV, counsel to the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On November 7, 2024, Plaintiff Alameda Research Ltd. (the “Plaintiff”) filed the *Complaint for Turnover of Assets Pursuant to 11 U.S.C. § 542 and Disallowance of Claims Pursuant to 11 U.S.C. § 502* [Adv. D.I. 1] (the “Complaint”) in the above-captioned adversary proceeding against Foris Dax MT Ltd., Foris DAX Asia Pte. Ltd., Foris DAX, Inc. and Iron Block Capital (the “Defendants”).

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

2. On November 21, 2024, a *Summons and Notice of Pretrial Conference in an Adversary Proceeding* [Adv. D.I. 3 & 4] (the “Summons”) was issued and Defendants agreed to accept service of the Complaint and waive their objections, if any, to service of process.

3. On December 19, 2024, the Parties stipulated to extend the Defendants’ time to respond to the Complaint until January 21, 2025. [Adv. D.I. 5, 6].

4. On January 17, 2025, the Parties stipulated to further extend the Defendants’ time to respond to the Complaint until February 7, 2025. [Adv. D.I. 9].

5. The Plaintiff and the Defendants (together, the “Parties”) have conferred and agree that the Defendants deadline to answer, move, or otherwise respond to the Complaint shall be further extended to and including February 21, 2025.

6. The Parties’ stipulation is attached as **Exhibit A** to the proposed form of order approving the stipulation, which is attached hereto as **Exhibit 1** (the “Order”).

7. Accordingly, the Parties respectfully request that the Bankruptcy Court enter the Order at its earliest convenience.

Dated: February 6, 2025
Wilmington, Delaware

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